

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

SANDRA CARDONA,

Case No.: 0:24-cv-61337-AHS

Plaintiff,

v.

NUTRITION FORMULATORS, INC., and
EMPLOYMENT SOLUTIONS OF NEW
YORK, INC.,

Defendants.

/

**JOINT MOTION FOR AN EXTENSION OF TIME FOR
LIMITED DISCOVERY AND TO FILE DISPOSITIVE MOTIONS**

Plaintiff, Sandra Cardona (“Plaintiff”), and Defendants, Nutrition Formulators, Inc., and Employment Solutions of New York, Inc. (“Defendants”) (collectively herein the “Parties”) by and through their respective undersigned counsel, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, and all other applicable rules, orders, and case law, hereby file this *Joint Motion for an Extension of Time For Limited Discovery, And to File Dispositive Motions* (“Motion”) and in support state as follows:

1. On October 10, 2024, this Court entered an Order Setting Trial and Pre-Trial Schedule (the “Order”). [D.E. 13].
2. Per the Order, the deadline for discovery was March 28, 2025.
3. Per the Order, the deadline for filing potentially dispositive motions is April 18, 2025.
4. The Parties appeared before the Honorable Judge Strauss on April 10, 2025, for a discovery hearing (the “Hearing”). At the Hearing, Judge Strauss decided that Plaintiff may continue the deposition of Nutrition Formulators Inc’s (“NFI”) corporate representative for the

limited purpose of asking questions related to documents produced after the initial date of NFI's corporate representative deposition.

5. Judge Strauss also ordered the production of unredacted versions of certain documents by NFI on an "attorneys' eyes only" basis. These documents must be reviewed and returned by Plaintiff's counsel before April 28, 2025.

6. The discovery deadline in this case was March 28, 2025.

7. The parties anticipate the continued deposition will be scheduled and conducted prior to April 28, 2025.

8. Accordingly, the Parties respectfully request that this Court allow the limited discovery permitted by Judge Strauss to take place on or before April 28, 2025.

9. The current deadline to file dispositive motions is April 18, 2025. Dispositive motions cannot be properly prepared by the current deadline in light of the foregoing. Accordingly, the Parties respectfully request that the dispositive motions deadline be extended to May 19, 2025.

10. The Parties certify they are not seeking the requested relief for any improper purpose. Rather, they do so to provide all Parties with sufficient opportunity to prepare the case and make an appropriate presentation to the Court and/or factfinder.

11. The Parties certify that the requested extension will not affect the trial date or any other deadline set forth in the Scheduling Order.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter an Order granting this Motion, as reflected above, and granting any further relief this Court deems just and proper.

Dated: Miami, Florida
April 10, 2025,

DEREK SMITH LAW GROUP, PLLC
Counsel for Plaintiff

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CERTIFICATE OF CONFERRAL PURSUANT TO LOCAL RULE 7.1(a)(3)

Pursuant to Local Rule 7.1(a)(3), I hereby certify that on April 10, 2025, Counsel for the Plaintiff conferred with each Defendant's counsel and jointly agreed to extending the Scheduling Order deadlines for discovery through April 28, 2025, and all other dispositive motions through May 19, 2025.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document is being served on April 10, 2025, on all counsel of record on the service list below via the Court's CM/ECF system.

/s/ Daniel J. Barroukh
Daniel J. Barroukh, Esq.

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